

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

*Wheeling-Pittsburgh Steel
Beech Bottom WV
WVD 00 079 7720*

DATE: *12/30/86*

FROM:

JD Douglas A. Donor, Environmental Scientist
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO:

John A. Armstead, Chief *JA*
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

Class II Violations



RCRA COMPLIANCE DIVISION
RECEIVED
DEC 02 1986

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES

CHARLESTON 25306

Division of Waste Management
1260 Greenbrier Street
Charleston, WV 25311
304/348-5935

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

MICHAEL A. FOTOS
Deputy Director

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

October 22, 1986

Mr. Bryan Hunt
Wheeling-Pittsburgh Steel Corporation
State Route 2
Beech Bottom, West Virginia 26030

Dear Mr. Hunt:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Water Resources. This report is based on the inspection conducted on September 25, 1986.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Branch with an additional copy transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you should have any questions concerning the inspection or enclosed report, please feel free to contact this office.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ronald A. Shipley
Acting Chief

RAS/pd

Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
Kevin Straight, Inspector

INSPECTION FACT SHEET

COMPANY NAME : Wheeling Pittsburgh Steel-
Beech Bottom

ID# WVD000797720

ADDRESS: State Route 2
Beech Bottom, West Virginia 26030

TYPE OF FACILITY: Generator

COMPANY CONTACT: Mr. Bryan Hunt

PHONE: (304) 234-2672

PURPOSE: Compliance Evaluation Inspection (CEI)

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;
West Virginia Administration Regulations for Chapter 20-5E;
and/or 40 CFR 265.

LIST OF CHEMICALS: D001
D002
D007
D008

DATE INSPECTED: September 25, 1986

INSPECTORS: (1) Kevin M. Straight, West Virginia Division of Water Resources
(2)

DATE PREPARED: October 3, 1986

PREPARED BY: Kevin M. Straight, West Virginia Division of Water Resources

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Inspection Report

RE: Wheeling Pittsburgh Steel - Beech Bottom Plant (WVD000797720)

DATE INSPECTED: September 25, 1986

INSPECTOR: Kevin M. Straight, West Virginia Division of Water Resources

DATE PREPARED: October 3, 1986

On September 25, 1986 at approximately 1000 hours this inspector arrived at the above referenced facility to conduct a Compliance Evaluation Inspection (CEI). Upon my arrival I was met by Mr. Bryan Hunt, Environmental Control; Mr. Jim Allen, Superintendent of Maintenance; and Mr. Wayne Cimino, Superintendent Industrial Relations and Safety. All three were made aware of my intentions to inspect via an earlier phone conversation with Mr. Hunt.

Upon presentation of appropriate credentials I advised these gentlemen as to the purpose of my visit and the authority under which the inspection would be conducted. They acknowledged and we continued with the inspection, first obtaining a description of facility operations.

This facility primarily produces metal roof deck, expanded steel mesh, and corrugated culvert pipe. The hazardous wastes are all a result of metal cleaning and preparation prior to manufacturing. Large coils (rolls) of steel are run through a cleaning line to remove any unwanted surface deposits. The cleaning line results in spent acid solutions containing chromium and lead wastes (D002, D007, D008) and chromate wastewater (D007). These two hazardous waste streams are channeled to the plant's wastewater treatment plant where a chromium containing sludge (D007) is generated. The sludge is pressed and eventually placed into an open top roll-off container for later disposal.

The next hazardous waste type, spent paint/solvent solution (D001) is generated during the painting operation immediately after the cleaning process is completed. This waste is containerized in 55 gallon drums for eventual disposal via incineration.

The corrugated culvert pipe process also has a Safety-Kleen parts cleaning basin which generates solvent wastes (D001) to be recycled by Safety-Kleen.

Discussion centered around the storage and containment of wastes in the hazardous materials storage building and the wastewater treatment area. The D001 waste, spent solvent/paint solution is stored inside a materials storage building providing good drum protection and spill containment (should it occur) however, the existence of adequate aisle space is questionable. I advised these gentlemen that containers of contaminated rags (also being stored at this location) are not as demanding of aisle space but there must be good access to drums containing liquid wastes, in particular, to enhance spill clean up efficiency. They acknowledged. It should be noted, however,

Wheeling Pittsburgh Steel - Beech Bottom (CEI)
Page Two
October 3, 1986

that all containers observed appeared in good condition and the chance of any imminent hazard seemed minimal.

We also examined the D007, D008 waste generation and storage area. The waste, after being dewatered via a filter press, is collected in open top hoppers. The hoppers are then carried with the prongs of a fork truck and emptied into an open top roll-off container. The primary problem is that quantity of waste which escapes the hoppers and ends up on the floor of the wastewater processing area. Once dried this waste creates a hazardous dust which can migrate away from the generation area creating localized environmental contamination. At present, housekeeping to prevent this dust from escaping is maintained reasonably well but these gentlemen were advised steps would have to be taken to prevent the material from escaping the hopper. In addition, the concrete pad used to contain the roll-off container was diked with steel I-beams on a heavy rubber mat-like material. In examining this rubber mat, surface water appeared to be leaking through it from beneath the steel beams. I, therefore, suggested that they take steps to better seal this dike structure as some spillage was noted on the surface of the concrete pad. They acknowledged.

Mr. Hunt also expressed another concern, that being the unreliable service of hazardous waste incineration facilities. He explained it is difficult to schedule shipments within their 90 day storage limitation because disposal facilities have such a backlog. I advised this problem is not uncommon as disposal demands are great and disposal facilities are becoming fewer and fewer. I therefore explained to Mr. Hunt that he should address a correspondence to the Branch/Division Office in Charleston anytime a disposal delay is anticipated. I noted this correspondence should contain justification for the delay, company/disposal firm contacts, and phone numbers to confirm the delay. Such a correspondence should be mailed each time a delay is encountered and such a delay should be an exception and not the rule.

Wheeling Pittsburgh Steel - Beech Bottom (CEI)

Page Three

October 3, 1986

Compliance Evaluation

1. All hazardous waste storage containers of 110 gallons or less did not display a label with the words "Hazardous Waste" and are therefore in violation of Chapter 20, Article 5E, Section (6.3.3b).
2. The date upon which each period of hazardous waste accumulation begins is not marked nor visible for inspection on each container and is therefore in violation of Chapter 20, Article 5E, Section (6.3.5.a.3).
3. The roll-off container storing D008 and D007 sludges is not kept closed when not in use and is therefore in violation of 40 CFR, Part 265.173.(a), as referenced by Section 6.3.5.a.1 of Chapter 20, Article 5E.

Wheeling Pittsburgh Steel - Beech Bottom (CEI)
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Concerns

The following is a summarization of concerns noted during this inspection.

1. Marginal aisle space in the drum storage area.
2. Inadequate containment of hazardous wastes in and near the wastewater treatment area.
3. Lack of hazardous waste labels and accumulation dates on all hazardous waste storage containers of 110 gallons or less.
4. Apparent difficulties and delays in scheduling timely disposal of hazardous wastes.

RCRA CHECKLIST FOR INSPECTION OF GENERATORS

RO USE

Name of Facility: Wheeling Pitt Steel- Beech Bottom

Inspection: 1a

Address: St. Rt. 2

No. _____

Beech Bottom, WV 26030

Reviewer _____

EIA Generator ID Number: WVD 000797720

Date Review: _____

Facility Inspection Representative: Mr. Bryan Hunt

Form "A"

Title: Environmental Control, Industrial HygienistTelephone Number: (304) 234-2672

Pert. Regs.

40 C.F.R.

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Manufacturer of metal roof deck,
expanded steel mesh, and
corrugated culvert pipe.

2. Does the generator dispose of its wastes....

A. On-site

(Circle one)

B. Off-Site

Note: If on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. Are 1000 kg (2200 Lbs) or more of hazardous waste produced by the generator facility in a month? (If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.)

(yes)

4. What categories of hazardous wastes result from the generator's facility?

A. Ignitable wastes

(yes)

B. Reactive wastes

(No)

C. Corrosive wastes

(yes)

D. EP Toxic wastes

(yes)

E. RCRA Listed Wastes

(No)

Types D007

D008

5. Is the generator presently...

A. Treating hazardous waste?

(No)

B. Storing hazardous wastes longer than 90 days?

(No)

C. Disposing hazardous waste?

(No)

Note: If the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

762.29

6. Is a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked?

(yes)

7. Please inspect the generator's manifest for the following information

262.20

- A. Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number?

☒ Yes ☐ No

262.20

- B. Is an alternative facility designated in case of an emergency? (Optional)

~~☒ Yes~~ ☒ No ^{KMS}

- C. Is a serialized manifest document number included on the form?

☒ Yes ☐ No

262.21

- D. Is the generator's name, address, telephone number and EPA ID number included on the form?

☒ Yes ☐ No

- E. Is the name and identification number of each transporter included on the form?

☒ Yes ☐ No

- F. Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

☒ Yes ☐ No

- G. Is the quantity of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form?

☒ Yes ☐ No

- H. Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.

☒ Yes ☐ No

"This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA."

262.22

- I. Are there adequate copies of the manifest available for generator, transporter, and TSD's?

☒ Yes ☐ No

- 262.34(a)(1) 8. Is all hazardous waste being shipped off-site by the generator within 90 days to a designated facility or placed in an on-site facility either of which has interim status or a Federal hazardous waste treatment, storage or disposal permit? (Yes) No
* see CEI report
- 262.34(a)(3) A. Is the date accumulation of waste began clearly marked on each container? Yes (No)
- 262.34(a)(2) B. Are storage containers or tanks in good condition, i.e., no corrosion, leaking or structural deformations? (Yes) No
- C. Starting at the time of initial accumulation are the storage containers
- 262.34(a)(4) 1) Labeled (Yes) No
- 262.34(a)(4) 2) Marked Yes (No)
- 262.34(a)(2) 3) Packaged (Yes) No
- as containing a particular hazardous waste in accordance with DOT regulations?

Questions 9-15 apply to generators who accumulate wastes in a non-permitted facility.

- 265.16(a) 9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? (Yes) No
- 265.16(d) 10. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? (Yes) No
- 265.16(d)(2) 11. Does the generator facility have on record a written position description for each job title noted in Question #10? (Yes) No
- 265.16(d)(3) 12. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #10? (Yes) No

265.32(a)

13. Does the generator facility have installed the following equipment:

A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion?

(Yes)

B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.?

(Yes) No

C. Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals?

(Yes) No

265.35

14. Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies?

(Yes) No

265.50

15. Does the facility have a contingency plan which contains the following elements:

A. Detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water?

(Yes) No

265.52(c)

B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations?

(Yes) No

265.52(d)

C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?

(Yes) No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e)

D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

(Yes) No

(Yes)

265.53

16. Has a copy of the contingency Plan been submitted to local police, fire departments, hospitals, and emergency response teams that may be called on to provide emergency services.
17. Please provide detailed explanation or comments on specific questions or problems encountered during the inspection. For instance, industry requests for exclusions from optional portions of the regulation or for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: Kevin M. Straight

Title: Hazardous Waste Inspector

Agency: W.V. Division of Water Resources

Office
location: Fairmont

Date of
Inspection: 9-25-86

Inspector's Name: _____

Title _____

Office
location _____

Date of
Inspection: _____

(Subpart I Section 265.170 - "General Operating Requirements")

Attachment "B"

Inspection File in _____

Reviewer: _____

Date Reviewed: _____

Form "I"

of Facility: Wheeling-Pittsburgh Steel - Beech Bottomss: St. Rt. 2Beech Bottom, WV 26030Generator ID Number: WVD000797720Facility Inspection Representative: Mr. Bryan HuntTitle: Environmental Control, Industrial HygienistPhone Number: (304) 234-2672

Questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

Regs.

F.R.

- | | | | |
|----------------|---|------------|------------|
| 71 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? | <u>Yes</u> | No |
| 71 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <u>Yes</u> | No |
| 73(a) | 3. Are all containers holding hazardous waste kept closed during storage? | Yes | <u>No</u> |
| 174 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week? | <u>Yes</u> | No |
| 15(d)
15(b) | 5. Is an inspection log maintained? | <u>Yes</u> | No |
| 176 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? | <u>Yes</u> | No |
| 177(a) | 7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.) | Yes | <u>No</u> |
| 177(c) | 8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? | Yes | <u>N/A</u> |

Inspector's Name: Kevin M. Straight
Title: Hazardous Waste Inspector
Agency: W.V. D.W.R.
Office location: Fairmont, WV
Date of Inspection: 9-25-86

Inspector's Name: _____
Title: _____
Agency: _____
Office location: _____
Date of Inspection: _____